

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
LORI HAHN, :
 :
Plaintiff, : CASE NO. 12-cv-4151
 :
-against- :
 :
BANK OF AMERICA, INC. and MARIA :
LOCCISANO, :
 :
Defendants. :
----- X

DEFENDANT’S RENEWED REQUEST FOR TAXATION OF COSTS

Pursuant to Fed. R. Civ. P. 54(d)(1), 28 U.S.C. § 1920, and S.D.N.Y. Local Civ. R. 54.1, Defendant Bank of America, N.A. (“the Bank”), as the prevailing party, hereby respectfully requests that Clerk of Court tax costs incurred in the above-captioned case.

On March 31, 2014, the Honorable Debra Freeman, United States Magistrate Judge, filed a Memorandum and Order granting Defendant’s motion for summary judgment, and, thereafter, on March 31, 2014, pursuant to Judge Freeman’s direction, the Clerk of Court entered final Judgment in favor of Defendant.

On April 11, 2014, Defendant as prevailing party on all of Plaintiff Lori Hahn’s (“Hahn” or “Plaintiff”) claims alleged in the Complaint, timely filed Defendant’s Request for Taxation of Costs within thirty (30) days after entry of final judgment by the District Court. As set forth in the Bill of Costs attached hereto as Exhibit A, and the Declaration of Counsel attached hereto as Exhibit B, the total costs that Defendant seeks as the prevailing parties is \$9,411.57. See Exhs A & B. However, because Plaintiff filed an Appeal, the Court denied Motion for Taxation of Costs on August 7, 2014 pending Plaintiff’s appeal, without prejudice to renew the motion if this Court’s judgment is affirmed.

On June 4, 2015, the United States Court of Appeals for the Second Circuit entered judgment affirming, per curiam, the judgment of the Southern District of New York. See June 4, 2015 Summary Order attached as Exhibit C. Hahn has not requested a rehearing or filed a petition for a writ of certiorari in the United States Supreme Court. On June 25, 2015, the United States Court of Appeals for the Second Circuit issued a Judgment Mandate effectively closing the matter. See June 25, 2015 Judgment Mandate attached as Exhibit D. The Hahn action thus has reached its final disposition and the Bill of Costs in the amount of \$9,411.57 may appropriately be taxed against Hahn pursuant to S.D.N.Y. Local Civ. R. 54.1.

Accordingly, Defendant respectfully requests that Clerk of Court tax costs incurred in the above-captioned case.

Respectfully submitted,

/s/Alice A. Kokodis
Alice A. Kokodis
Locke Lord LLP
111 Huntington Avenue
Boston, MA 02199
Tele. No. (617) 239-0100
Fax No. (617) 227-4420
akokodis@edwardswildman.com

Dated: July 1, 2015

CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2015, I electronically filed **Defendant's Renewed Request for Taxation of Costs** with the Clerk of the District Court using the CM/ECF system, and that a copy of the within was served via the Court's ECF filing system upon plaintiff's counsel as follows:

Eric Baum, Esq.
SIMON, EISENBERG & BAUM, LLP
24 Union Square East, Fifth Floor
New York, NY 10003

/s/ Alice A. Kokodis

Alice A. Kokodis

EXHIBIT A

UNITED STATES DISTRICT COURT

for the

Southern District of New York

LORI HAHN

v.

BANK OF AMERICA, INC.

Case No.: 1:12-cv-04151-DCF

BILL OF COSTS

Judgment having been entered in the above entitled action on 03/31/2014 against Plaintiff, Lori Hahn,
Date
 the Clerk is requested to tax the following as costs:

Fees of the Clerk	\$
Fees for service of summons and subpoena	234.95
Fees for printed or electronically recorded transcripts necessarily obtained for use in the case	5,476.62
Fees and disbursements for printing
Fees for witnesses (itemize on page two)	0.00
Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case.
Docket fees under 28 U.S.C. 1923
Costs as shown on Mandate of Court of Appeals
Compensation of court-appointed experts
Compensation of interpreters and costs of special interpretation services under 28 U.S.C. 1828
Other costs (please itemize)	3,700.00
TOTAL	\$ 9,411.57

SPECIAL NOTE: Attach to your bill an itemization and documentation for requested costs in all categories.

Declaration

I declare under penalty of perjury that the foregoing costs are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed. A copy of this bill has been served on all parties in the following manner:



Electronic service



First class mail, postage prepaid



Other:

s/ Attorney: Alice A. KokodisName of Attorney: Alice A. Kokodis

For: Bank of America, N.A.
Name of Claiming Party

Date: 06/23/2015

Taxation of Costs

Costs are taxed in the amount of and included in the judgment.

By:

*Clerk of Court**Deputy Clerk**Date*

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
LORI HAHN,	:	
	:	
Plaintiff,	:	CASE NO. 12-cv-4151
	:	
-against-	:	
	:	
BANK OF AMERICA, INC. and MARIA	:	
LOCCISANO,	:	
	:	
Defendants.	:	
-----	X	

DECLARATION OF COUNSEL

Now comes Alice A. Kokodis who, after being first duly sworn according to law, deposes and states that she is of full legal age, has full knowledge of all events stated herein, and is competent to testify to the matters set forth below.

Further, Declarant states that:

1. I am an attorney in good standing licensed to practice law in the State of New York;
2. I am counsel with the law firm of Locke Lord LLP and I represent Defendant Bank of America, N.A., incorrectly identified in the Complaint as Bank of America, Inc. (“Defendant”) in this lawsuit;
3. During the course of discovery, Defendant took the deposition of plaintiff Lori Hahn (“Plaintiff” or “Hahn”), and expert witnesses, Michael Soudry (“Soudry”) and Dr. Roy Lubit (“Lubit”) in defense of its claims. In addition, Plaintiff took the depositions of Anthony Volpicello (“Volpicello”), Maria Loccisano (“Loccisano”), Wyder Tutiven (“Tutiven”), Charles Castillo (“Castillo”), Evelyn Henriquez (“Henriquez”), Gabriella Ruhlig (“Ruhlig”), Maria Soares (“Soares”), Oliver Whitelaw (“Whitelaw”) and Tamara Johnson (“Johnson”), all either former or current employees of Bank of America, N.A., in support of her claims. Defendant relied on Volpicello, Loccisano, Tutiven, Castillo, Ruhlig, Soares, and Whitelaw’s deposition transcripts in

its successful summary judgment briefing before this Court. In procuring the deposition transcripts for filing with the Court in support of the Motion for Summary Judgment, Defendant incurred a cost of \$5,476.62. Attached hereto as Exhibit 1 are true and accurate copies of the invoices from Veritext New York Reporting Co., documenting these costs.

4. Defendant took the Hahn, Soudry and Lubit depositions for the purpose of summary judgment briefing, among other goals, and it was reasonably necessary for the defense of Defendant in this matter.

5. Defendant defended the depositions of Volipcello, Loccisano, Tutiven, Castillo, Henriquez, Ruhlig, Soares, Whitelaw and Johnson for the purpose of summary judgment briefing, among other goals, and it was reasonably necessary for the defense of Defendant in this matter.

6. Defendant took the depositions of Michael Soudry, M.B.A. and Dr. Roy Lubit because they were reasonably necessary for the defense of Defendant in this matter. Attached hereto as Exhibit 2 are true and accurate copies of the invoices for the service of subpoenas on Michael Soudry, MBA and Dr. Roy Lubit. In procuring the depositions of Soudry and Lubit, Defendant incurred a cost of \$3,700.00 for witness fees and attendance at deposition. Attached hereto as Exhibit 3 are true and accurate copies of the invoices for Soudry and Lubit's attendance at deposition.

7. The total amount of costs sought by Bank of America, N.A. as prevailing party is \$9,411.57.

Executed this 1 day of July, 2015.

/s/Alice A. Kokodis

Alice A. Kokodis

EXHIBIT 1

**200 Old Country Road, Suite 580
Mineola, NY 11501
Tel. (516) 808-2400 Fax. (516) 808-2460**

Invoice #:	NY1642660
Invoice Date:	12/27/2012
Balance Due:	\$500.75

do not -

Case: Hahn v. Bank Of America Job #: 1576545 Job Date: 12/14/2012 Delivery: Normal Location: Simon Eisenberg & Baum LLP 24 Union Square East, 5th Floor 15 & 16th Street New York, NY 10003	File No: 12-CV4151 311979-000
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Quantity	Description	Unit	Qty	Price	Amount
Anthony Volpicello	Certified Transcript	Page	138.0	\$3.25	\$432.25
	CD Depo Litigation Package	Per CD	1.0	\$39.00	\$39.00
	Shipping & Handling	Package	1.0	\$29.50	\$29.50
Notes:				Invoice Total:	\$500.75
				Payment:	
				Credit:	
				Interest:	\$0.00
Fed. Tax ID: 20-3132569			Term: Net 30		Balance Due:
					\$600.75

TERMS: Payable upon receipt. Accounts 50 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days.



Make check payable to:

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SIGNATURE (AS IT APPEARS ON CREDIT CARD) _____

PRINT NAME (AS IT APPEARS ON CREDIT CARD) _____

Invoice #: NY1642660
Job #: 1678545
Invoice Date: 12/27/2012
Balance : \$500.75

Please remit payment to:
Veritext
P.O. Box 71303
Chicago, IL 60694-1303

For more information on charges related to our services please consult www.veritest.com/serviceinfo

CNS 185336 JAN 21 2013

W-2 TAXABLE

Veritext New York Reporting Co.

200 Old Country Road, Suite 580
Mineola, NY 11501
Tel. (516) 608-2400 Fax. (516) 608-2450

Bill To: Alice A. Kokodis, Esq.
Edwards Wildman Palmer LLP
111 Huntington Ave
Boston, MA 02189

Invoice #: NY1646543
Invoice Date: 12/31/2012
Balance Due: \$546.25

Case: Hahn v. Bank Of America Job #: 1576546 Job Date: 12/17/2012 Delivery: Normal Location: Simon Eisenberg & Baum LLP 24 Union Square East, 6th Floor New York, NY 10003	File No: 12-CV4151 <i>do not</i> <i>311979-0010</i>
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Quantity	Description	Unit	Qty	Price	Amount
1	Certified Transcript	Page	147.0	\$3.25	\$477.75
1	CD Depo Litigation Package	Per CD	1.0	\$38.00	\$38.00
1	Shipping & Handling	Package	1.0	\$29.50	\$29.50
Notes:				Invoice Total:	\$546.25
Fed. Tax ID: 20-3132589 Term: Net 30				Payment:	
				Credit:	\$0.00
				Interest:	
				Balance Due:	\$546.25

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days.



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SIGNATURE (AS IT APPEARS ON CREDIT CARD) _____

PRINT NAME (AS IT APPEARS ON CREDIT CARD) _____

Please remit payment to:
Veritext
P.O. Box 71303
Chicago, IL 60684-1303

Invoice #: NY1646543
Job #: 1576546
Invoice Date: 12/31/2012
Balance: \$546.25

For more information on charges related to our services please consult: www.veritext.com/serviceinfo

CHS 165336 JAN 21 2013 NON-TAXABLE

INVOICE

Veritext New York Reporting Co.

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Bill To: Alice A. Kokodis, Esq.
Edwards Wildman Palmer LLP
111 Huntington Ave
Boston, MA 02199

31979
10

Invoice #: NY1647347
Invoice Date: 01/02/2013
Balance Due: \$517.00

Case:	Hahn v. Bank Of America
Job #:	1579748 Job Date: 12/18/2012 Delivery: Normal
Location:	Simon Eisenberg & Baum LLP 24 Union Square East, 5th Floor 16 & 18th Street New York, NY 10003

Maria Loccasano	Certified Transcript	Page	138.00	\$3.25	\$444.50
	CD Depo Litigation Package	Per CD	1.00	\$39.00	\$39.00
	Shipping & Handling	Package	1.00	\$28.50	\$28.50
Notes:					Invoice Total: \$517.00
					Payments:
					Credit:
					Interest: \$0.00
Fed. Tax ID: 20-3132589 Term: Net 30					Balance Due: \$517.00

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 60 days shall be paid at cashed terms, including collection charges. Contact us to correct payment errors. No adjustments will be made after 90 days.



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CVS 186364 FEB 18 2013

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REGISTRATION AND IT APPROVALS ARE REQUIRED

YOUR NAME HAS TO BE VERIFIED ON THE CARD

Please mail payment to:
P.O. Box 11344
Chicago, IL 60611-0344

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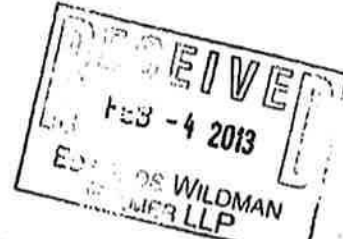
Invoice #: NY1647347
Job/Contract #: 1579748
Invoice Date: 01/02/2013
Balance Due: \$517.00

311979-0010

INVOICE

Veritext New York Reporting Co.

200 Old Country Road, Suite 580
Mineola, NY 11501
Tel. (516) 608-2400 Fax. (516) 608-2450



Bill To: Attn: Debra Willdrige
Edwards Wildman Palmer LLP
111 Huntington Ave
Boston, MA 02199-7618

Invoice #: NY1658898
Invoice Date: 01/17/2013
Balance Due: \$825.50

Case: Hahn Lori v. Bank Of America
Job #: 1575792 | Job Date: 12/11/2012 | Delivery: Normal
Location: Simon Eisenberg & Baum LLP
24 Union Square East, 5th Floor | 15 & 16th Street | New York, NY 10003

Client #
Matter #
Hearing

Charles D. Castillo	Certified Transcript	Page	51.00	\$3.25	\$165.75
Evelyn (Guzman) Honriquez	Certified Transcript	Page	50.00	\$3.25	\$162.50
Gabriella C. Ruhl	Certified Transcript	Page	57.00	\$3.25	\$185.25
Maria L. Soares	Certified Transcript	Page	59.00	\$3.25	\$191.50
Notes:					Invoice Total: \$825.50
Fed. Tax ID: 20-3132569					Payments: \$0.00
Term: Net 30					Interest: \$0.00
					Balance Due: \$825.50

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days shall be paid in full without interest, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 60 days.



E693956

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CVS 18786 MAR 18 2013

Credit Card #

SIGNATURE (AS IT APPEARS ON CREDIT CARD)

PRINT NAME (AS IT APPEARS ON CREDIT CARD)

received
3/11/13

Please return payment to:
P.O. Box 1100
Chicago, IL 60601-0110

NY1658898
1575792
01/17/2013
\$825.50

INVOICE

311979/0010

Veritext New York Reporting Co.

200 Old Country Road, Suite 580
Mineola, NY 11501
Tel. (516) 608-2400 Fax. (516) 608-2450

Bill To: Almee S. Lin Esq
Edwards Wildman Palmer LLP
1 Giralda Farms
Madison, NJ 07840-1027

Invoice #: NY1686114
Invoice Date: 01/28/2013
Balance Due: \$316.50

Case: Hahn v. Bank Of America
Job #: 1686039 | Job Date: 1/18/2013 | Delivery: Normal
Location: DC/Mineola - VIDEOCONFERENCE
200 Old Country Road | Suite # 580 - large conference room | Mineola, NY

Client #
Matter #
Hearing

Wyder Tullven	Certified Transcript	Page	65.00	\$3.50	\$238.00
	CD Depo Litigation Package	Per CD	1.00	\$39.00	\$39.00
	Shipping & Handling	Package	1.00	\$39.50	\$39.50
Notes:					Invoice Total: \$316.50
					Payment:
					Credit:
					Interest: \$0.00
					Balance Due: \$316.50

Fed. Tax ID: 20-3132569 Term: Net 30
TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days.



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Please tear off stub and return with payment.

DVS 187061 MAR 18 2013

received
2/11/13

Make check payable to: Veritext

☐ VISA ☐ MC ☐ AMEX

NON-PAYABLE

Credit Card:

Exp. Date:

Invoice #
Job Confirmation No.
Invoice Date
Balance

NY1686114
1686039
01/28/2013
\$316.50

Please remit payment to:
P.O. Box 11003
Chicago, IL 60686-0103

311979-0010

INVOICE**Veritext New York Reporting Co.**

200 Old Country Road, Suite 580
 Mineola, NY 11501
 Tel. (516) 608-2400 Fax. (516) 608-2450

o/c

Bill To: Debra Wildridge
 Edwards Wildman Palmer LLP
 1 Giralda Farms
 Madison, NJ 07940-1027

Invoice #: NY1678246
Invoice Date: 02/13/2013
Balance Due: \$610.50

Case: Hahn v. Bank Of America
Job #: 1590039 | **Job Date:** 1/18/2013 | **Delivery:** Normal
Location: DC/Mineola - VIDEOCONFERENCE
 200 Old Country Road | Suite # 580 -large conference room | Mineola, NY 11501

Hearing
Client #

Oliver Whitlaw	Certified Transcript	Page	152.00	\$3.50	\$532.00
	CD Depo Litigation Package	Per CD	1.00	\$39.00	\$39.00
	Shipping & Handling	Package	1.00	\$39.50	\$39.50
Notes:				Invoice Total:	\$610.50
				Payment:	
				Credit:	
				Interest:	\$0.00
				Balance Due:	\$610.50

Fed. Tax ID: 20-3132569

Term: Net 30

TERMS: Payable upon receipt. Accounts 30 days past due will bear a service charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days.



E693959

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received
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DVS 187861 MAR 19 2013

Make check payable to: Veritext

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NON-TAXABLE

Check Card # _____

Signature _____

Invoice #: NY1678246
Job/Confirmation No.: 1590039
Invoice Date: 02/13/2013
Balance: \$610.50

Please remit payment to:
 P.O. Box 11503
 Mineola, NY 11501-0153

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200 Old Country Road, Suite 580
Mineola, NY 11501
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OK

Bill To: Debra Willdridge
Edwards Wildman Palmer LLP
111 Huntington Ave.
Boston, MA 02199-7818

Invoice #: NY1678295
Invoice Date: 02/14/2013
Balance Due: \$550.00

Case: Hahn v. Bank Of America	Hearing Client #
Job #: 1590043 Job Date: 1/18/2013 Delivery: Normal	
Billing Atty: Debra Willdridge	
Location: Audio Video Resources 4323 E. Cotton Cir. Blvd. Phoenix, AZ 85040	
Depo Atty: John Gallo Esq.	

Oliver Whitelaw	Videoconference - Hourly Connection Fee	Hour	5.00	\$110.00	\$550.00
Notes: Videoconference - Billed bridging fees to Edwards only.				Invoice Total:	\$550.00
Fed. Tax ID: 20-3132589				Payment:	
Term: Net 30				Credit:	
				Interest:	\$0.00
				Balance Due:	\$550.00

TERMS: Payment upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days.



E693931

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received
3/13/13

CVS 187 B16 1 MAR 18 2013

NON TAXABLE

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Card # _____ Exp. Date _____

Invoice # NY1678295
Job Confirmation No. # 1590043
Invoice Date 02/14/2013
Balance Due \$550.00

Please mail payment to:
P.O. Box 5303
Chicago, IL 60680-1303

INVOICE

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200 Old Country Road, Suite 580
Mineola, NY 11501

Tel. (516) 608-2400 Fax. (516) 608-2450



E695025

OLC
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Bill To: Alice A. Kokodis, Esq.
Edwards Wildman Palmer LLP
111 Huntington Ave.
Boston, MA 02199-7618

Invoice #: NY1702502
Invoice Date: 03/15/2013
Balance Due: \$383.12

Case: Hahn Lori v. Bank Of America
Job #: 1821549 | Job Date: 3/5/2013 | Delivery: Normal
Location: Office Suites PLUS Tyvola
6047 Tyvola Glen Cir. | Charlotte, NC 28217

Hearing
Client #

Client	Description	Page	Rate	Amount
Tamara Johnson	Certified Transcript	79.00	\$3.50	\$276.50
	CD Depo Litigation Package	Per CD	1.00	\$39.00
	Exhibits	Per Page	38.00	\$17.46
	Exhibits Scanned-Searchable-OCR	Per page	38.00	\$11.02
	Shipping & Handling	Package	1.00	\$39.50
Notes:				
			Invoice Total	\$383.12
			Payment	
			Credit	
			Interest	\$0.00
			Balance Due	\$383.12

Fed. Tax ID: 20-3132569

Term: Net 30

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 60 days subject to late charges. Please contact us to correct payment errors. No adjustments will be made after 60 days.

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CVS 18 APR 3 2 APR 2013

Credit Card #

Signature Date

NON-TAXABLE

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Chicago, IL

INVOICE

311979-0010

Veritext New York Reporting Co.

200 Old Country Road, Suite 580
Mineola, NY 11501
Tel. (516) 608-2400 Fax. (516) 608-2450

APR -3 2013

EDWARDS WILDMAN
LLP

Bill To: Alice A. Kokodis, Esq.
Edwards Wildman Palmer LLP
111 Huntington Ave.
Boston, MA 02108-7618

Invoice #: NY1713839
Invoice Date: 03/28/2013
Balance Due: \$340.00

Case: Hahn Lori v. Bank Of America
Job #: 1623492 | Job Date: 3/5/2013 | Delivery: Normal
Billing Atty: Alice A. Kokodis, Esq.
Location: Office Suites PLUS Tyvola
6047 Tyvola Glen Cir. | Charlotte, NC 28217
Sched Atty: Alice A. Kokodis, Esq.
Depo Atty: Alice Kokodis

File No: 12-CV4151

	Veritext Virtual Primary Participants	1	1.00	\$295.00	\$295.00
	Conference Call	1	1.00	\$45.00	\$45.00
Notes:				Invoice Total:	\$340.00
				Payment:	
				Credit:	
				Interest:	\$0.00
				Balance Due:	\$340.00

Fed. Tax ID: 20-3132689

Term: Net 30

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days.



E695034

Please tear off stub and return with payment.

CVS 189832 APR 22 2013

received
4/2/13

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NON-TAXABLE

Credit Card # _____ Exp. Date _____

SIGNATURE (AS IT APPEARS ON CREDIT CARD) _____

PRINT NAME (AS IT APPEARS ON CREDIT CARD) _____

Please remit payment to:
P.O. Box 71303
Chicago, IL 60694-1303

Invoice #: NY1713839
Job #: 1623492
Invoice Date: 03/28/2013
Balance: \$340.00

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Veritext Corporate Services, Inc.

290 West Mt. Pleasant Ave, Suite 2260
Livingston NJ 07039
Tel. 973-410-4040 Fax. 973-410-1313
Fed. Tax ID: 20-3457913

**Bill To:**

Bank of America
555 California St.
Fl. 8
San Francisco, CA, 94104-1511

Invoice #: CS1768627**Invoice Date:** 6/4/2013**Balance Due:** \$0.00**Agency #:** 1650578

Case: Hahn, Lori v. Bank of America
Job #: 1648783 | Job Date: 4/25/2013 | Delivery: Normal
Billing Atty:
Location: Edwards Wildman & Palmer LLP
750 Lexington Ave | 12th floor | New York, NY 10022
Sched Atty: Alice A. Kokodis, Esq. | Edwards Wildman

Billing #: L27482-20120301**Matter #:** L27482-20120301

Witness	Description	Units	Quantity	Price	Amount
Michael Soudry	Original with 1 Certified Transcript	Page	62.00	\$4.00	\$248.00
	Attendance Fee	1	1.00	\$50.00	\$50.00
	CD Depo Litigation Package	Per CD	1.00	\$39.00	\$39.00
	Shipping & Handling	Package	1.00	\$18.00	\$18.00
Roy Lubit	Original with 1 Certified Transcript	Page	133.00	\$4.00	\$532.00
Notes:				Invoice Total:	\$887.00
				Payment:	(\$887.00)
				Credit:	\$0.00
				Interest:	\$0.00
				Balance Due:	\$0.00

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult <http://www.veritext.com/services/all-services/service-information>

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Chicago IL 60694-1303

Invoice #: CS1768627**Job #:** 1648783**Invoice Date:** 6/4/2013**Balance:** \$0.00

EXHIBIT 2

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INVOICE

INVOICE #: 20130225152319
AMOUNT DUE: \$204.95
DUE DATE: 04/04/2013

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AMOUNT DUE: \$204.95	DUE DATE: 04/04/2013	INVOICE #: 20130225152319	INVOICE DATE: 03/05/2013
ATTORNEY:	JENNIFER HAGEMAN, ESQ.		
FIRM:	EDWARDS WILDMAN PALMER, LLP-BOSTON		
PLAINTIFF:	LORI HAHN		
DEFENDANT:	BANK OF AMERICA, INC		
DOCKET#:	12 CV 4151	CLAIM#:	
ENTITY SERVED:	ROY LUBIT, M.D., PH.D.		
SERVED WITH:	SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION, FEDERAL RULE OF CIVIL		
PROCEDURE			
SERVED DATE:	02/28/2013	COURT DATE:	03/08/2013
ATTENDANCE FEE:	\$0.00	PAYMENT SENT ON:	___/___/___
SERVICE FEE:	\$119.95	AMOUNT PAID:	___,___,___
MILEAGE FEE:	\$0.00		
PRIORITY FEE:	\$30.00		
PICKUP FEE:	\$0.00		
INCORRECT ADDRESS FEE:	\$0.00		
POSTAL FORWARDING FEE:	\$0.00		
CASH ATTACHED:	\$55.00		
WAIT TIME 0.00 HOURS FEE:	\$0.00		
NOTARY/MISC FEE:	\$0.00		
TOTAL:	\$204.95		

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EDWARDS WILDMAN PALMER, LLP-BOSTON
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BOSTON, MA 02199

INVOICE #: 20130225152319
AMOUNT DUE: \$204.95
DUE DATE: 04/04/2013

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INVOICE

EDWARDS WILDMAN PALMER, LLP-BOSTON
ALICE KOKODIS, ESQ
111 HUNTINGTON AVENUE
BOSTON, MA 02199

INVOICE #: 20130225151508
AMOUNT DUE: \$30.00
DUE DATE: 04/04/2013

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AMOUNT DUE: \$30.00	DUE DATE: 04/04/2013	INVOICE #: 20130225151508	INVOICE DATE: 03/05/2013
ATTORNEY:	ALICE KOKODIS, ESQ		
FIRM:	EDWARDS WILDMAN PALMER, LLP-BOSTON		
PLAINTIFF:	LORI HAHN		
DEFENDANT:	BANK OF AMERICA, INC.		
DOCKET#:	12 CV 4151	CLAIM#:	
ENTITY SERVED:	MICHAEL SOUDRY, M.B.A		
SERVED WITH:	SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION, FEDERAL RULE OF CIVIL		
PROCEDURE			
SERVED DATE:		COURT DATE:	03/08/2013
ATTENDANCE FEE:	\$0.00	PAYMENT SENT ON:	___/___/___
SERVICE FEE:	\$0.00	AMOUNT PAID:	___/___/___
MILEAGE FEE:	\$0.00		
PRIORITY FEE:	\$30.00		
PICKUP FEE:	\$0.00	<input type="checkbox"/> CHECK	
INCORRECT ADDRESS FEE:	\$0.00	<input type="checkbox"/> VISA	
POSTAL FORWARDING FEE:	\$0.00	<input type="checkbox"/> MASTERCARD	
CASH ATTACHED:	\$0.00	<input type="checkbox"/> DISCOVER	
WAIT TIME 0.00 HOURS FEE:	\$0.00	<input type="checkbox"/> AMERICAN EXPRESS	
NOTARY/MISC. FEE:	\$0.00		
TOTAL:	\$30.00	CARD/CHECK#:	_____

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INVOICE #: 20130225151508
AMOUNT DUE: \$30.00
DUE DATE: 04/04/2013

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EXHIBIT 3

#187383

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New York
1700 Broadway, 23rd Floor
New York, New York 10019
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212.842.7001 Fax

(800) ECO-STAT Tel
(888) ECO-STAT Fax

February 28, 2013

Edward Widman Palmer, LLP
111 Huntington Avenue
Boston, MA 02199

Re: Lori Hahn
Our Case No.: 5131094

Deposition testimony on March 7, 2013

2 hours @ \$350.00 per hour:

\$700.00

Tax ID: 13-4138344



February 28, 2013 486276

SEVEN HUNDRED AND 00/100 DOLLARS

\$***700.00

ECO-STAT LLC
1700 Broadway, 23rd Floor
New York, NY 10019
U.S.A.

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ECO-STAT LLC

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Invoice No.	Invoice Date	Description	Invoice	Discount	Payment
311979.0010	2/28/2013	for Deposition Testimony on March 7, 2013, re: Lori Hahn, Our Case Number 5131094	\$700.00	\$0.00	\$700.00



Roy Lubit MD, Ph.D.

165 West End Ave 3K
New York, NY 10023

roylubit@rcn.com
917-846-7829



Board Certifications
Psychiatry and Neurology
Child & Adolescent Psychiatry
Forensic Psychiatry

March 4, 2013

Bill for Deposition Concerning Hahn Case

\$3000

RoyLubit



EXHIBIT C

14-1454

Hahn v. Bank of America N.A.

**UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT**

SUMMARY ORDER

RULINGS BY SUMMARY ORDER DO NOT HAVE PRECEDENTIAL EFFECT. CITATION TO A SUMMARY ORDER FILED ON OR AFTER JANUARY 1, 2007, IS PERMITTED AND IS GOVERNED BY FEDERAL RULE OF APPELLATE PROCEDURE 32.1 AND THIS COURT'S LOCAL RULE 32.1.1. WHEN CITING A SUMMARY ORDER IN A DOCUMENT FILED WITH THIS COURT, A PARTY MUST CITE EITHER THE FEDERAL APPENDIX OR AN ELECTRONIC DATABASE (WITH THE NOTATION "SUMMARY ORDER"). A PARTY CITING A SUMMARY ORDER MUST SERVE A COPY OF IT ON ANY PARTY NOT REPRESENTED BY COUNSEL.

At a stated term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 4th day of June, two thousand fifteen.

PRESENT: ROBERT D. SACK,
 RICHARD C. WESLEY,
 PETER W. HALL,
 Circuit Judges.

LORI HAHN,

Plaintiff-Appellant,

-v.-

No. 14-1454

BANK OF AMERICA N.A.,

Defendant-Appellee,

MARIA LOCCISANO,

Defendant.

For Plaintiff-Appellant: Eric M. Baum, Eisenberg & Baum, LLP,
New York, NY.

For Defendant-Appellee: Alice A. Kokodis, Edwards Wildman
Palmer LLP, Boston, MA.

Appeal from the United States District Court for the Southern District of
New York (Freeman, M.J.).

**UPON DUE CONSIDERATION, IT IS HEREBY ORDERED,
ADJUDGED AND DECREED** that the judgment is **AFFIRMED**.

Plaintiff Lori Hahn brought suit against her former employer, Bank of America (“BOA” or the “Bank”), under both Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq.*, and the New York State Human Rights Law (“NYSHRL”), N.Y. Exec. Law § 290, *et seq.*, claiming the Bank discriminated against her on the basis of her national origin, created a hostile work environment, and retaliated against her for her complaints to the Bank’s human resources department. Following discovery, BOA moved for summary judgment and Hahn voluntarily dismissed her discrimination claim. In its March 31, 2014, Memorandum and Opinion, the magistrate judge granted summary judgment for BOA on Hahn’s retaliation and hostile work environment claims. Hahn

appeals that decision. We affirm for reasons stated by the magistrate judge in her Memorandum and Opinion.

We have considered all of Hahn's arguments and find them to be without merit. Accordingly, we **AFFIRM** the judgment.

FOR THE COURT:

Catherine O'Hagan Wolfe, Clerk

The signature is written in cursive and is positioned over a circular official seal. The seal contains the text "UNITED STATES", "SECOND CIRCUIT", and "COURT OF APPEALS".

EXHIBIT D

MANDATE

14-1454

Hahn v. Bank of America N.A.

N.Y.S.D. Case #
12-cv-4151(DCF)

UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

SUMMARY ORDER

RULINGS BY SUMMARY ORDER DO NOT HAVE PRECEDENTIAL EFFECT. CITATION TO A SUMMARY ORDER FILED ON OR AFTER JANUARY 1, 2007, IS PERMITTED AND IS GOVERNED BY FEDERAL RULE OF APPELLATE PROCEDURE 32.1 AND THIS COURT'S LOCAL RULE 32.1.1. WHEN CITING A SUMMARY ORDER IN A DOCUMENT FILED WITH THIS COURT, A PARTY MUST CITE EITHER THE FEDERAL APPENDIX OR AN ELECTRONIC DATABASE (WITH THE NOTATION "SUMMARY ORDER"). A PARTY CITING A SUMMARY ORDER MUST SERVE A COPY OF IT ON ANY PARTY NOT REPRESENTED BY COUNSEL.

At a stated term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 4th day of June, two thousand fifteen.

PRESENT: ROBERT D. SACK,
RICHARD C. WESLEY,
PETER W. HALL,
Circuit Judges.

**USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: June 25, 2015**

LORI HAHN,

Plaintiff-Appellant,

-v.-

No. 14-1454

BANK OF AMERICA N.A.,

Defendant-Appellee,

MARIA LOCCISANO,

Defendant.

For Plaintiff-Appellant: Eric M. Baum, Eisenberg & Baum, LLP,
New York, NY.

For Defendant-Appellee: Alice A. Kokodis, Edwards Wildman
Palmer LLP, Boston, MA.

Appeal from the United States District Court for the Southern District of
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appeals that decision. We affirm for reasons stated by the magistrate judge in her Memorandum and Opinion.

We have considered all of Hahn's arguments and find them to be without merit. Accordingly, we **AFFIRM** the judgment.

FOR THE COURT:

Catherine O'Hagan Wolfe, Clerk

A True Copy

Catherine O'Hagan Wolfe, Clerk

United States Court of Appeals, Second Circuit